

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT - IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Loula Wilson Johnson to appear and plead, answer or demur, within thirty days from the service hereof, to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, In Equity, by Woodrow Wilson, as complainant, against Loula Wilson Johnson, as respondent.

Witness my hand this 27th day of Nov, 1953.

Alice F. Wink
Register.

COMPLAINT

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WOODROW WILSON,

Complainant, I IN THE CIRCUIT COURT OF

vs.

BALDWIN COUNTY, ALABAMA

LOULA WILSON JOHNSON,

I IN EQUITY.

Respondent. I

TO THE HONORABLE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY,
AND TO THE HONORABLE H. M. HALL, JUDGE THEREOF:

Comes your Complainant, Woodrow Wilson, and respectfully re-
presents and shows unto your Honor and to this Honorable Court as
follows:

FIRST:

That he is over the age of twenty-one and a resident citizen
of Bay Minette, Baldwin County, Alabama. That the Respondent, Loula
Wilson Johnson, is over the age of twenty-one and a resident citizen
of Bay Minette, Baldwin County, Alabama.

SECOND:

That your Complainant and the Respondent were formerly married
to one another but they were divorced by a decree of this Honorable
Court made and entered on the 25th day of October, 1949, in that
certain cause wherein Loula Roberts Wilson was the Complainant and
your Complainant was the Respondent, and which cause was numbered
2372. That there were born to your Complainant and the Respondent
six children; Robert, now 21 years of age; Andrew Franklin, now 17
years of age and a member of the U. S. Marines; Dixon D., now 15
years of age and residing with your Complainant; Georgia Mae, now
12 years of age; Mary Lou, now 11 years of age; and Peggy Ann, now
7 years of age, all of the daughters presently residing with your
Complainant in Bay Minette.

THIRD:

That in and by the terms of the divorce decree referred to
above the Respondent herein was awarded the care, custody and control
of the minor daughters named above and although said decree was
silent as to the custody of the minor sons it was understood that
your Complainant herein was to have such care, custody and control.

That notwithstanding the terms of the decree referred to above the Respondent has never had the care, custody and control of said minor daughters but they have remained in the custody of your Complainant with the consent and acquiescence of the Respondent who has never, during the last four years, made any attempt to enforce the provisions of said decree relative to the custody of said daughters until, to-wit: November 24, 1953, when she informed said children that she was coming to the home of the Respondent to get them and take them home with her.

FOURTH:

That both your Complainant and the Respondent have remarried and the Respondent has had two children by this latter marriage who are of very tender ages. That your Complainant's present wife has cared for and provided for the said daughters and treated them, in all respects, as if they were her own, and said daughters are apparently happy in their present home and have expressed to your Complainant their desire to remain in his care and custody and unwillingness to live in the home of their mother or to change their present home. That your Complainant has no other children than those named above and is gainfully employed and able to provide said children with a proper home and all the necessities.

FIFTH:

That in view of the facts averred above your Complainant alleges that there has been a change of circumstances since the rendition of the decree referred to above and that it would be to the best interest of the said minor children if they were allowed to remain with your Complainant in his home.

PRAYER FOR PROCESS

The premises considered your Complainant respectfully prays that your Honor will cause the usual writ of process to issue out of this Court notifying the Respondent of the filing of this Petition and requiring her to plead, answer or demur to the same within the time required by law and the rules of this Honorable Court.

PRAYER FOR RELIEF

Your Complainant further prays that upon a final hearing hereof that your Honor will enter an order or decree amending the divorce decree hereinabove referred to insofar as the provision thereof re-

lative to the custody of said minor daughters is concerned and will, in and by the terms of said decree award to your Complainant the care, custody and control of said minor daughters, Georgia Mae Wilson, Mary Lou Wilson and Peggy Ann Wilson; and your Complainant prays for such other, further and different orders and decrees as in equity will be meet and proper.

Respectfully Submitted,

Woodrow Wilson
Complainant.

Sworn to and Subscribed
before me this 27th day of
November, 1953.

J. A. Middlebury Jr.
Notary Public, Baldwin County, Ala.

THE STATE OF ALABAMA,
Baldwin County } No. 3148

Circuit Court, In Equity.

WOODRON WILSON

Complainant....

Vs.

LOULA WILSON JOHNSON

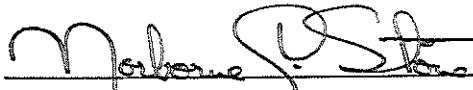
Defendant....

Motion is hereby made for a Decree Pro Confesso against Loula Wilson Johnson

Defendant....

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant; and that said summons was duly served according to law, and that said Defendant... ha s failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 14th day of January 19 54


Norborne C. Stone

Solicitor.

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THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, In Equity

WOODROW WILSON

Vs.

LOULA WILSON JOHNSON

Motion for Decree Pro Confesso on
Personal Service

Filed January 14, 1954

Alice J. Durke
Register.

Recorded in ----- Record

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Register.